

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

INTERNATIONAL FRESH PRODUCE  
ASSOCIATION, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF LABOR, *et al.*,

Defendants.

Case No. 1:24-cv-00309-HSO-BWR

**DEFENDANTS' MOTION FOR A STAY OF PROCEEDINGS**

Defendants, by and through their undersigned counsel, respectfully request a 90-day stay of proceedings. The stay is necessary to allow incoming leadership at the Department of Labor further time to review this litigation, including the claims that Plaintiffs and Intervenors have asserted challenging the Rule.

Counsel for Defendants conferred with counsel for Plaintiffs and Intervenors, and both consent to the relief sought in this motion.

DATED: February 28, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

JULIE STRAUS HARRIS  
Assistant Branch Director

/s/ Michael P. Clendenen  
MICHAEL P. CLENDENEN  
Trial Attorney  
Civil Division, Federal Programs Branch  
U.S. Department of Justice  
1100 L Street, NW  
Washington, DC 20005  
Phone: (202) 305-0693  
E-mail: michael.p.clendenen@usdoj.gov

*Counsel for Defendants*